

THE RESTIS LAW FIRM, P.C.  
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[Additional Counsel Listed On Signature Page]

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

**GGCC, LLC**, an Illinois Limited  
Liability Company, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

**DYNAMIC LEDGER SOLUTIONS,  
INC.**, a Delaware Corporation, **TEZOS  
STIFTUNG**, a Swiss Foundation,  
**KATHLEEN BREITMAN**, an  
Individual, and **ARTHUR BREITMAN**,  
an Individual,

Defendants.

Case No: 3:17-cv-06779-RS

**DECLARATION OF WILLIAM R.  
RESTIS IN SUPPORT OF GGCC  
GROUP'S MOTION FOR  
CONSOLIDATION, APPOINTMENT  
OF LEAD PLAINTIFF AND  
APPROVAL OF LEAD COUNSEL  
SELECTION**

Date: March 8, 2018

Time: 1:30 p.m.

Courtroom: 3 – 17<sup>th</sup> Floor

**ANDREW OKUSKO**, individually and  
on behalf of all others similarly situated,

Plaintiff,

v.

**DYNAMIC LEDGER SOLUTIONS,  
INC., THE TEZOS FOUNDATION,  
KATHLEEN BREITMAN, ARTHUR  
BREITMAN, and TIMOTHY  
DRAPER,**

Case No: 3:17-cv-06829-RS

Defendants.

**ANDREW BAKER**, individually and on behalf of all others similarly situated,

Plaintiff,

v.

**DYNAMIC LEDGER SOLUTIONS, INC.**, a Delaware corporation, **TEZOS STIFTUNG**, a Swiss Foundation, **KATHLEEN BREITMAN**, an Individual, **ARTHUR BREITMAN**, an Individual, **JOHANN GEVERS**, an individual, **STRANGE BREW STRATEGIES, LLC**, a California limited liability company, and **DOES 1 through 100 inclusive**,

Defendant.

Case No. 3:17-cv-06850-RS

**BRUCE MACDONALD**, Individually and on Behalf of All Others Similarly Situated,

Plaintiff,

v.

**DYNAMIC LEDGER SOLUTIONS, INC.**, a Delaware corporation, **TEZOS STIFTUNG**, a Swiss Foundation, **KATHLEEN BREITMAN**, an Individual, **ARTHUR BREITMAN**, an Individual, **TIMOTHY COOK DRAPER**, an individual, **DRAPER ASSOCIATES**, **JOHANN GEVERS**, **DIEGO PONZ**, **GUIDO SCHMITZKRUMMACHER**, **BITCOIN SUISSE AG**, **NIKLAS NIKOLAJSEN**, and **DOES 1-100, INCLUSIVE**,

Defendants.

Case No. 3:17-cv-07095-JSC

1 I, WILLIAM R. RESTIS, declare as follows:

2 1. I am an attorney licensed to practice before all of the courts of the State of  
3 California and this Court. I am managing member of The Restis Law Firm, P.C.,  
4 proposed co-lead counsel for GGCC, LLC, Pumaro, LLC, and Nick Anthony (the  
5 “GGCC Group”) in the above-captioned action. I make this declaration in support of  
6 the GGCC Group’s Motion for Consolidation, Appointment of Lead Plaintiff and  
7 Approval of Lead Counsel Selection. I have personal knowledge of the matters stated  
8 herein and, if called upon, I could and would competently testify thereto.

9 2. Attached are true and correct copies of the following exhibits:

10 EXHIBIT A: GGCC, LLC’S Notice of pendency of class action published  
11 on Cision PRNewswire, a national business-oriented wire  
12 service, on November 26, 2017.

13 EXHIBIT B: GGCC, LLC’s [Corrected] Sworn Certification<sup>1</sup>

14 EXHIBIT C: Pumaro, LLC’s Sworn Certification

15 EXHIBIT D: Nick Anthony’s Sworn Certification

16 EXHIBIT E: The Restis Law Firm, P.C.’s firm résumé

17 EXHIBIT F: Certificate of William R. Restis Pursuant to Local Rule 3-7(d)

18 3. While researching this action, I have spoken with dozens of United States  
19 investors in the Tezos Initial Coin Offering (“ICO”). In addition, I have reviewed  
20 hundreds of internet comments and twitter postings concerning the Tezos project. Based  
21 on this investigation, it has become clear that a significant portion of the proposed Class  
22 wish to see the Tezos project succeed.

23 ///

24 ///

25  
26 <sup>1</sup> GGCC, LLC’s Corrected Certification fixes a typographical error in its original  
27 certification filed with the Complaint. It corrects the date of contribution to the Tezos  
ICO from 7/17/17 to 7/7/17.

1 I declare under penalty of perjury of the laws of the United States that the  
2 foregoing is true and correct. Executed this 25th day of January, 2018.

3  
4 /s/ William R. Restis  
5 William R. Restis, Esq.  
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# **EXHIBIT A**



# The Restis Law Firm And Lite DePalma Greenberg File Class Action Challenging The Tezos Initial Coin Offering

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NEWS PROVIDED BY

**The Restis Law Firm, P.C. and Lite DePalma Greenberg LLC →**

19:42 ET

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SAN DIEGO, Nov. 26, 2017 /PRNewswire/ -- The Restis Law Firm, P.C. and Lite DePalma Greenberg LLC ("Restis Law Firm" and Lite DePalma") today announced that a class action has been commenced on behalf of United States persons and entities that contributed bitcoin and/or ethereum to the Tezos Initial Coin Offering ("ICO"). This action was filed in the Northern District of California and is captioned *GGCC, LLC v. Dynamic Ledger Solutions, Inc. et al.*, No. 5:17-cv-06779 (<https://restislaw.com/current-cases-investigations/tezos-initial-coin-offering/>)

If you wish to serve as lead plaintiff, you must move the Court no later than 60 days from November 26, 2017. If you wish to discuss this action or have any questions concerning this notice or your rights or interests, please contact plaintiff's counsel William R. Restis at (619) 270-8383, or [support@restislaw.com](mailto:support@restislaw.com). You may also contact Joseph J. DePalma or Bruce D. Greenberg of Lite DePalma at (973) 623-3000, at [jdepalma@litedepalma.com](mailto:jdepalma@litedepalma.com), or [bgreenberg@litedepalma.com](mailto:bgreenberg@litedepalma.com).

If you are a member of this class, you can view a copy of the complaint as filed at <https://restislaw.com/current-cases-investigations/tezos-initial-coin-offering/>. Any member of the putative class may move the Court to serve as lead plaintiff through counsel of their choice, or may choose to do nothing and remain an absent class member.

The complaint charges that Dynamic Ledger Solutions, Inc., Tezos Stiftung (a/k/a the Tezos Foundation), Kathleen Breitman, and Arthur Breitman engaged in an unregistered offering and sale of securities in violation of Sections 5, 12(a)(1) and 15 of the Securities Act of 1933, 15 U.S.C. §§ 77e, 77l(a)(1) and 77o.

Tezos founders claim it is a "decentralized blockchain that governs itself by establishing a true digital commonwealth." Tezos was marketed as potentially solving major limitations of bitcoin and ethereum by "letting participants directly control the rules of the network." Tezos is purportedly "designed to evolve, so that the next generation of ideas doesn't have to start over as a new blockchain."

The complaint alleges that the Tezos ICO was an offer and sale of "securities" to United States investors. As such, the defendants were required to file a Registration Statement with the Securities and Exchange Commission. No Registration Statement was filed, and no exemption from registration was available. Accordingly, Plaintiff seeks to recover bitcoin and ethereum contributed to the Tezos ICO, along with any corresponding appreciation in value of those invested assets, or the equivalent in monetary damages or restitution.

The plaintiff is represented by the Restis Law Firm and Lite DePalma, two firms with extensive experience in prosecuting investor class actions. For over a decade, William Restis has been litigating complex, multi-district, and multi-party class actions. Please visit <https://restislaw.com/> for more information.

Lite DePalma Greenberg is widely recognized as a leading law firm advising and representing U.S. and international investors in securities class actions. Lite DePalma's extensive class counsel experience is listed at <http://www.litedepalma.com/class-action-law-firm>.

SOURCE The Restis Law Firm, P.C. and Lite DePalma Greenberg LLC



# **EXHIBIT B**



**[CORRECTED] CERTIFICATION OF REPRESENTATIVE PLAINTIFF  
PURSUANT TO FEDERAL SECURITIES LAWS**

I, Brian R. Beeman, as managing member and authorized representative of GGCC, LLC, an Illinois Limited Liability Company ("Plaintiff"), declare that:

1. I have reviewed the Complaint against Dynamic Ledger Solutions, Inc., Tezos Stiftung, Kathleen Breitman, and Arthur Breitman, alleging violations of federal securities laws and authorized its filing.
2. Plaintiff did not purchase the security that is the subject of this action at the direction of Plaintiff's counsel or in order to participate in this private action.
3. Plaintiff is willing to serve as a representative party on behalf of the class, including providing testimony at deposition and trial, if necessary.
4. Plaintiff's transactions in Tezos securities that are the subject of this action during the Class Period set forth in the Complaint are as follows:

***See, attached Schedule "A"***

5. Plaintiff has not sought to serve as a representative party for a class action filed under the Securities Exchange Act of 1934 or Securities Act of 1933 within the last three years.
6. Plaintiff, either directly or indirectly, will not accept any payment for serving as a representative party on behalf of the class beyond the Plaintiff's *pro rata* share of any recovery, except such reasonable costs and expenses (including lost wages) directly relating to the representation of the class as ordered or approved by the court.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed this 24th day of January, 2018 at Springfield, Illinois.

*Brian Beeman*

*1/24/18*

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Brian R. Beeman

Managing Member and Authorized  
Representative of GGCC, LLC



**Schedule "A"**

## Tezos Securities Transactions

<b>GGCC, LLC</b>	<b>Contribution</b>	<b>Trade Date</b>	<b>Amount of Tezos Promised</b>	<b>Price Per Tezos Token</b>
Tezos Initial Coin Offering	11 Ether	07/7/17	5823.65	.00187553/Eth

VSB  
1/24/18

# **EXHIBIT C**



**CERTIFICATION OF REPRESENTATIVE PLAINTIFF  
PURSUANT TO FEDERAL SECURITIES LAWS**

I, Ron Puma, as managing member of Pumaro, LLC ("Plaintiff"), declare that:

1. I have reviewed GGCC, LLC's Complaint against Dynamic Ledger Solutions, Inc., Tezos Stiftung, Kathleen Breitman, and Arthur Breitman, alleging violations of federal securities laws. And adopts its allegations
2. Plaintiff did not purchase the security that is the subject of this action at the direction of Plaintiff's counsel or in order to participate in this private action.
3. Plaintiff is willing to serve as a representative party on behalf of the class, including providing testimony at deposition and trial, if necessary.
4. Plaintiff's transactions in Tezos securities that are the subject of this action during the Class Period set forth in the Complaint are as follows:

***See, attached Schedule "A"***

5. Plaintiff has not sought to serve as a representative party for a class action filed under the Securities Exchange Act of 1934 or Securities Act of 1933 within the last three years.
6. Plaintiff, either directly or indirectly, will not accept any payment for serving as a representative party on behalf of the class beyond the Plaintiff's *pro rata* share of any recovery, except such reasonable costs and expenses (including lost wages) directly relating to the representation of the class as ordered or approved by the Court.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed this 23 day of January, 2018 at Richmond, Texas.

  
\_\_\_\_\_  
Ron Puma, as managing member of Pumaro LLC

**Schedule “A”**

## Tezos Securities Transactions

<b>Pumaro, LLC</b>	<b>Contribution</b>	<b>Trade Date</b>	<b>Amount of Tezos Promised</b>	<b>Price Per Tezos Token</b>
Tezos Initial Coin Offering	1.9 Bitcoin	07/1/17	11,400	0.00016667 /Bitcoin

# **EXHIBIT D**

**CERTIFICATION OF REPRESENTATIVE PLAINTIFF  
PURSUANT TO FEDERAL SECURITIES LAWS**

I, Nick Anthony ("Plaintiff"), declare that:

1. I have reviewed GGCC, LLC's Complaint against Dynamic Ledger Solutions, Inc., Tezos Stiftung, Kathleen Breitman, and Arthur Breitman, alleging violations of federal securities laws and adopt its allegations.
2. Plaintiff did not purchase the security that is the subject of this action at the direction of Plaintiff's counsel or in order to participate in this private action.
3. Plaintiff is willing to serve as a representative party on behalf of the class, including providing testimony at deposition and trial, if necessary.
4. Plaintiff's transactions in Tezos securities that are the subject of this action during the Class Period set forth in the Complaint are as follows:

***See, attached Schedule "A"***

5. Plaintiff has not sought to serve as a representative party for a class action filed under the Securities Exchange Act of 1934 or Securities Act of 1933 within the last three years.
6. Plaintiff, either directly or indirectly, will not accept any payment for serving as a representative party on behalf of the class beyond the Plaintiff's *pro rata* share of any recovery, except such reasonable costs and expenses (including lost wages) directly relating to the representation of the class as ordered or approved by the court.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed this 24 day of January, 2018 Cranberry Township, Pennsylvania.

 1/25/2018  
Nick Anthony



**Schedule “A”**

## Tezos Securities Transactions

<b>Nick Anthony</b>	<b>Contribution</b>	<b>Trade Date</b>	<b>Amount of Tezos Promised</b>	<b>Price Per Tezos Token</b>
Tezos Initial Coin Offering	0.0406	07/1/17	None	N/A

# **EXHIBIT E**



## EDUCATION

- ❖ *U. San Diego School of Law*, J.D., 2006
- ❖ *James Madison College*, Michigan State University, B.A. 2002 (*Dean's List*)

## BAR ADMISSIONS

- ❖ California 2006

## COURT ADMISSIONS

- ❖ Southern District of California
- ❖ Northern District of California
- ❖ Central District of California
- ❖ Eastern District of California
- ❖ Ninth Circuit Court of Appeals
- ❖ Western District of Washington
- ❖ Western District of Wisconsin
- ❖ District of Nebraska

## William R. Restis

For over a decade, I have been litigating complex, multi-district, and multi-party class actions. I have recovered over two hundred million dollars in value for class members, and changed the law to help protect them.

I founded The Restis Law Firm, P.C. in 2017. Prior to founding RLF, I represented investors and consumers at San Diego's oldest class action law firm, Finkelstein & Krinsk LLP.

In addition to class actions, I also practice other forms of complex litigation. This includes representing whistleblowers before the Department of Justice and Securities and Exchange Commission, and consumers of defective products in several MDLs.

I also served as general counsel for two technology start-ups, and am a longtime board member of a highly successful non-profit.

Notable past cases that I was either lead attorney or had significant involvement include:



*Hahn v. Massage Envy Franchising LLC*, No. 3:12-cv-000153 (S.D. Cal.) (nationwide settlement with 75% restitution of class members' lost prepaid massages valued by experts between \$179-\$225 million). In *Massage Envy*, I won every motion, and established complete liability to the class on *plaintiff's* motion for summary judgment. 2014 WL 5100220 (S.D. Cal. Sept. 25, 2014). In doing so, the Court adopted my proposed extension of California's doctrines on unconscionability, liquidated damages and franchisor liability that have since been relied upon by several courts.



*Sanai v. BMW of North America*, No. 2:12-cv-06105 (D.N.J.) (nationwide settlement recovering lost warranty and 100% reimbursement of repair costs valued by expert at \$12.8 million)



*Derry v. Jackson Nat'l Insurance Co.*, No. 4:12-cv-1380 (N.D. Cal.) (California settlement recovering \$11.2 million in annuity surrender charges, and reducing future surrender charges)



*Klien v. Walgreen Company et al.*, No. GIC 795254 (S.D. Sup. Ct.) (California class settlement prohibiting pharmacies from using medical information for marketing)



*Utility Consumers Action Network v. Albertsons, Inc. et al.*, No. GIC830069 (S.D. Sup. Ct.) (California class settlement prohibiting pharmacies from using medical information for marketing)



*Heckert v. A-1 Self Storage, Inc.*, No. S232322 (Cal. Supreme Ct.) (pending appeal concerning whether the sale of a “protection plan” is the unlawful sale of “insurance” entitling class members to restitution of inflated charges)



*Verdiek v. TD Ameritrade, Inc.*, No. 16-3016 (8th Cir. Ct. App.) (pending appeal challenging the application of SLUSA to best execution claims against stockbroker)



*Lim v. Charles Schwab & Co., Inc.*, No. 16-15189 (pending appeal challenging the application of SLUSA to best execution claims against stockbroker)



*Scherer v. Tiffany and Company, Co.*, 3:11-cv-00532 (S.D. Cal.) (class action settlement providing free Tiffany's merchandise)



*Austin v. Michaels Stores Inc.*, No. 37-2011-00085906 (S.D. Sup. Ct.) (class action settlement providing free merchandise)



*Saratoga Advantage Trust v. ICG, Inc. et al.*, No. 2:08-cv-00011 (S.D.W. Va.) (\$1.4 million securities class action settlement)

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# **EXHIBIT F**

THE RESTIS LAW FIRM, P.C.  
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550 West C St., Suite 1760  
San Diego, California 92101  
Telephone: +1.619.270.8383

[Additional Counsel Listed On Signature Page]

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

**GGCC, LLC**, an Illinois Limited  
Liability Company, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

**DYNAMIC LEDGER SOLUTIONS,  
INC.**, a Delaware Corporation, **TEZOS  
STIFTUNG**, a Swiss Foundation,  
**KATHLEEN BREITMAN**, an  
Individual, and **ARTHUR BREITMAN**,  
an Individual,

Defendants.

Case No: 3:17-cv-06779-RS

**CERTIFICATE OF WILLIAM R.  
RESTIS PURSUANT TO LOCAL  
RULE 3-7(d)**

**ANDREW OKUSKO**, individually and  
on behalf of all others similarly situated,

Plaintiff,

v.

**DYNAMIC LEDGER SOLUTIONS,  
INC., THE TEZOS FOUNDATION,  
KATHLEEN BREITMAN, ARTHUR  
BREITMAN**, and **TIMOTHY  
DRAPER**,

Defendants.

Case No: 3:17-cv-06829-RS

- 1 -

RESTIS DECL ISO GGCC GROUP'S MOTION FOR  
CONSOLIDATION, LEAD PLAINTIFF, AND LEAD  
COUNSEL

No. 5:17-cv-06779-RS

**ANDREW BAKER**, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

**DYNAMIC LEDGER SOLUTIONS,  
INC.**, a Delaware corporation, **TEZOS  
STIFTUNG**, a Swiss Foundation,  
**KATHLEEN BREITMAN**, an  
Individual, **ARTHUR BREITMAN**, an  
Individual, **JOHANN GEVERS**, an  
individual, **STRANGE BREW  
STRATEGIES, LLC**, a California  
limited liability company, and **DOES 1  
through 100 inclusive**,

Defendant.

Case No. 3:17-cv-06850-RS

**BRUCE MACDONALD**, Individually  
and on Behalf of All Others Similarly  
Situating,

Plaintiff,

v.

**DYNAMIC LEDGER SOLUTIONS,  
INC.**, a Delaware corporation, **TEZOS  
STIFTUNG**, a Swiss Foundation,  
**KATHLEEN BREITMAN**, an  
Individual, **ARTHUR BREITMAN**, an  
Individual, **TIMOTHY COOK  
DRAPER**, an individual, **DRAPER  
ASSOCIATES**, **JOHANN GEVERS**,  
**DIEGO PONZ**, **GUIDO  
SCHMITZKRUMMACHER**,  
**BITCOIN SUISSE AG**, **NIKLAS  
NIKOLAISEN**, and **DOES 1-100,  
INCLUSIVE**,

Defendants.

Case No. 3:17-cv-07095-JSC

CERTIFICATE PURSUANT TO LOCAL RULE 3-7(d)

Pursuant to Northern District Local Rule 3-7(d), I, WILLIAM R. RESTIS, declare as follows:

I do not directly own or otherwise have a beneficial interest in the Tezos securities that are the subject of this action.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed this 25th day of January, 2018.

/s/ William R. Restis  
William R. Restis, Esq.